



GABRIEL P. HARVIS
BAREE N. FETT

January 25, 2017

BY ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Gordon. v. City of New York, et al.*, 15 CV 2439 (CBA) (VMS)

Your Honor:

I represent plaintiff in the above-referenced matter. I write pursuant to the Court's orders dated January 13 and 19, 2017 to respectfully provide a status report.

As an initial matter, Mr. Gordon will be retaining replacement counsel and the undersigned respectfully requests leave to withdraw from plaintiff's representation in accordance with Local Civil Rule 1.4. The undersigned counsel represents that the application is made on good cause, Mr. Gordon consents to the withdrawal and this firm will not be asserting any lien in connection with the matter. Further, Mr. Gordon is current on his discovery obligations and there is ample time remaining in the schedule for replacement counsel to conduct depositions and prepare the case for trial. If it should please the Court, plaintiff thus respectfully requests, with defendants' consent, a 60-day stay of the matter for plaintiff to select and retain replacement counsel. To the extent the Court would like further details regarding the basis for the withdrawal of counsel, leave is respectfully requested to submit such material *ex parte*.

With respect to the parties' proposed revised discovery schedule, after conferral the parties respectfully propose the following:

Stay for plaintiff to obtain replacement counsel ends: March 27, 2017


Deadline for completion of fact discovery: July 31, 2017

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Jan. 25, 2017

In light of the foregoing, plaintiff respectfully requests: 1) leave for counsel to withdraw pursuant to Local Civil Rule 1.4; and 2) that the Court review and adopt the proposed schedule set forth above.

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis

cc: Mr. Nick Gordon (by e-mail)

ACC Angharad K. Wilson, Esq.
Attorney for City defendants

H. Jonathan Rubinstein, Esq.
Attorney for BHNWN Defendants